

UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA  
SPARTANBURG DIVISION

ROGER STEVENS, AS PERSONAL  
REPRESENTATIVE OF THE ESTATE  
OF JOHNIE STEVENS,

Plaintiff,

V.

THI OF SOUTH CAROLINA AT  
CAMP CARE, LLC d/b/a LAKE  
EMORY POST ACUTE CARE,  
HUNT VALLEY HOLDINGS, LLC  
f/k/a FUNDAMENTAL LONG-  
TERM CARE HOLDINGD, LLC,  
LYNETTE HILL, INDIVIDUALLY,  
AND AS REPRESENTATIVE OF  
THI OF SOUTH CAROLINA AT  
CAMP CARE, LLC d/b/a LAKE  
EMORY POST ACUTE CARE,  
AND AETNA LIFE INSURANCE  
COMPANY,

Defendants.

**DEFENDANT, AETNA LIFE INSURANCE COMPANY’S UNOPPOSED MOTION  
FOR EXTENSION OF TIME TO RESPOND TO PLAINTIFF’S COMPLAINT**

Defendant, Aetna Life Insurance Company (“Aetna”) pursuant to Rule 6(b)(1) of the Federal Rules of Civil Procedure and Local Rule 6.01 respectfully requests an additional seven days to file its responsive pleading.<sup>1</sup> Aetna’s unopposed motion is due to be granted for the following reasons:

<sup>1</sup> Aetna expressly preserves and does not waive any and all available defenses, including those defenses specifically enumerated in Rule 12(b) of the Federal Rules of Civil Procedure, including without limitation, insufficient service of process, lack of subject matter jurisdiction, personal jurisdiction, improper venue, and failure to state a claim upon which relief can be granted.

1. Aetna removed this case to this Court on February 10, 2025. (Doc. 1). Therefore, under FED. R. CIV. P. 81(c)(2)(C), its current deadline to file a responsive pleading is February 17, 2025.

2. Due to pending deadlines in other cases and previously scheduled travel, undersigned counsel needs additional time to prepare a responsive pleading and obtain client approval for filing. Therefore, Aetna respectfully requests an additional seven days to file its responsive pleading in this Court, making its deadline February 24, 2025.

3. Defense counsel contacted Plaintiff's counsel, who does not oppose a 7-day extension of the responsive-pleading deadline.

4. No prejudice will result to any party from the granting of this request for a brief extension. In addition, this request for an extension of time is made within the court-prescribed period to respond to the Complaint, is sought in good faith, and will not cause excessive delay in this case.

5. For the foregoing reasons, Defendant Aetna Life Insurance Company respectfully requests a 7-day extension of time, to and including February 24, 2025, to file its responsive pleading to Plaintiff's Complaint.

Respectfully submitted by,

By: /s/ Ashley R. Parr  
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**CERTIFICATE OF SERVICE**

The undersigned certifies that a copy of the foregoing instrument was served upon the attorneys of record of all parties in accordance with Rule 5(b), Federal Rules of Civil Procedure, on this 12<sup>th</sup> day of February 2025.

/s/ Ashley R. Parr

Ashely R. Parr